

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

**IN THE MATTER OF:**

**Nucor Steel Marion, Inc.  
912 Cheney Ave.  
Marion, OH 43301-1801**

**ATTENTION:**

**Trevor Beers  
Environmental Manager**

**Request to Provide Information Pursuant to the Clean Air Act**

The U.S. Environmental Protection Agency is requiring Nucor Steel Marion, Inc. (NSM or you) to submit certain information about the facility at 912 Cheney Ave., Marion, Ohio. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within thirty (30) calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

NSM owns and operates an emission source at the Marion, Ohio facility. We are requesting this information to determine whether your emission source is complying with the Ohio State Implementation Plan and applicable federal regulations.

NSM must send all required information to:

Attn: Compliance Tracker, AE-17J  
Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency  
Region 5  
77 W. Jackson Boulevard  
Chicago, Illinois 60604

NSM must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

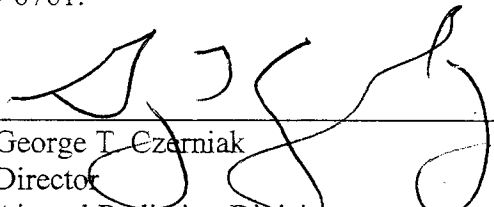
We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject NSM to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Albana Bega at (312) 353-4789 or Dakota Prentice at (312) 886-6761.

Date

4/22/16

  
George T. Czerniak  
Director  
Air and Radiation Division

## **Appendix A**

When providing the information requested in Appendix B, use the following instructions and definitions.

### **Instructions**

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

### **Electronic Submissions**

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Microsoft Excel Workbook format, and not in image format. If Microsoft Excel Workbook format is not

available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Microsoft Excel.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

#### **Definitions**

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

1. The terms “document” and “documents” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms “relate to” or “pertain to” (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.
3. The term “tap-to-tap cycle” shall mean an electric arc furnace operating cycle made up of the following operations: furnace charging, melting, refining, de-slagging, tapping, and furnace turn-around.

## Appendix B

### Information You Are Required to Submit to EPA

NSM must submit the following information for its facility located at 912 Cheney Ave., Marion, Ohio ("the facility") pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a), within thirty (30) calendar days of its receipt of this letter:

1. Provide a copy of each current air permit issued to NSM by the Ohio Environmental Protection Agency (Ohio EPA), including, but not limited to, permit-to-install (PTI), permit-to-install and operate (PTIO), and Part 70 (Title V) permit-to-operate.
2. Provide a copy of all permit applications submitted to Ohio EPA from April 2006 to the present. Also provide a copy of the original permit application for the current Part 70 Operating Permit Renewal (Title V Permit), issued on September 8, 2015 (Permit Number P0112447).
3. Provide a copy of all previous final permits issued by Ohio EPA to the facility from April 2006 to the present.
4. Provide a table of all emissions tests conducted at the facility for any reason, from April 2006 to the present, and provide copies of all emissions test reports. Emission testing includes, but is not limited to, compliance testing, engineering testing, and testing for general information. Use the following guidelines for compiling the table and preparing copies of the stack test reports:
  - a. **Table:** Identify the emissions unit, the control device, the date of the test, the federal or state regulation requiring the test (if applicable), pollutants tested, throughput during the test, and the test method(s) used. For each test during which the source was not operating at maximum design capacity, provide an explanation for why production was limited. Indicate whether the report was shared with Ohio EPA.
  - b. **Copies:** Provide full stack test reports, including the summary pages, the section describing the process parameters and production or processing rates at the time of the test, all test runs, and all calculations.
5. Provide copies of any deviation, excess emissions reports, or startup, shutdown, and malfunction reports for the facility submitted to Ohio EPA or EPA from April 2011 to the present.
6. Provide copies of all quarterly reports, semi-annual compliance reports, or equivalent documents for the facility submitted to either Ohio EPA or EPA from April 2011 to the present.
7. Provide copies of all annual emissions reports submitted to Ohio EPA for the facility from April 2011 to the present, and include:

- a. A narrative describing the method used for the annual emissions calculations for each pollutant, including the basis of any emissions factors used;
  - b. Any documents outlining procedures for calculating annual emissions; and
  - c. A table describing the assumed/estimated capture efficiencies for each control device(s) and the associated emission unit(s), including any associated documentation used in developing the capture efficiencies.
8. Provide all Method 9 visual emissions (opacity) readings from April 2011 to the present. The records should state the emission unit, control device, and/or stack. Abnormal emissions observations should be accompanied by records of the reasonable steps taken in response to the emissions.
9. Provide all documents, related to all studies, inspections, or evaluations conducted or attempted for any reason from April 2006 to the present, of the air pollution control equipment and control systems at the facility, including, but not limited to:
  - a. System improvements implemented based on findings of any study, inspection, or evaluation;
  - b. Modeling emissions of air pollutants to the atmosphere;
  - c. Ventilation of the Electric Arc Furnace (EAF), stirring station, continuous casters, and steel billet reheat furnace;
  - d. Capture and collection of pollutants emitted by the EAF, stirring station, continuous casters, and steel billet reheat furnace;
  - e. Performance of the baghouse-ventilation-and-control system (including volumetric flow measurements and static pressure measurements); and
  - f. Commissioning reports.
10. Provide all documents related to the facility modifying the meltshop to obtain 100 percent (%) capture of all emissions generated in the meltshop building. These documents should include but not be limited to engineering studies and emission modeling studies. For any study including computational fluid dynamics analysis of meltshop emissions, include the model input data, if that information is not provided in response to Request Number 9 above.
11. Provide a diagram of the ventilation-and-control system that controls emissions from the EAF, stirring station, continuous casters, and steel billet reheat furnace that shows:
  - a. All ducted pickup points, canopies, hoods, etc.
  - b. All damper locations, if applicable; and

- c. The location of all devices used to measure air flow or pressure, if applicable.
- 12. Provide a diagram of the melt shop that provides:
  - a. Dimensions of the EAF (including interior diameter), stirring station (including interior diameter), steel billet reheat furnace, and their locations within the melt shop (e.g., distance from floor, walls, etc.);
  - b. Dimensions of the melt shop building including the location and size of all building openings (e.g., overhead doors, roof vents, etc.); and
  - c. Dimensions of ventilation pickup points associated with the melt shop (i.e., distance from floor, walls, etc.) and distance from emission source to pickup point.
- 13. Provide the volume of the canopy hood above the EAF. Provide the volume of the building roof if it serves as the canopy hood above the EAF.
- 14. Provide a statement that identifies how the facility ensures compliance with the requirement that the meltshop "is equipped with a canopy hood/bag system capable of achieving 100% capture of all emissions within the meltshop building" pursuant to Section 6.b.2.a of the Title V Permit and provide all records and supporting documentation that demonstrate compliance with this requirement, from September 29, 2015 to the present.
- 15. For the EAF, provide the following information in a Microsoft Excel Workbook or compatible format, for all times that the emission units were operating during the period of April 2011 to the present:
  - a. Monthly production in tons, including tons per rolling twelve (12) consecutive-month periods;
  - b. Monthly average tap-to-tap cycle time;
  - c. Monthly average production rate (tons/hour);
  - d. Dates of installation of all improvements and modifications; and
  - e. Baghouse dust collected in tons per month from the EAF Baghouse.
- 16. For the EAF, provide the following information, recorded and maintained pursuant to 40 C.F.R. § 60.274.a, for the period April 2011 to the present, including, but not limited to, fan amperage, damper positioning, and furnace static pressure:
  - a. Recorded operating parameter data in a Microsoft Excel Workbook or compatible format;
  - b. Operating parameter limits;



- c. Method used to establish each operating parameter limit; and
  - d. Effective dates of the operating limit parameters.
17. For the fabric filter Bag Leak Detection System (BLDS), provide the following information in a Microsoft Excel Workbook or other compatible format from April 2011 to the present:
- a. Recorded alarms, including the date and time of the alarm, the cause of the alarm, the amount of time taken for corrective action to be initiated, explanation of the corrective actions taken, and the date the cause of the alarm was corrected; and
  - b. Inspections and maintenance performed on the BLDS, including results of any drift checks and response tests;
18. For the baghouse, provide the following information in a Microsoft Excel Workbook or compatible format from April 2011 to the present:
- a. Pressure drop range associated with proper operation established during the compliance tests;
  - b. Method used to establish the pressure drop range associated with proper operation;
  - c. Effective dates of the pressure drop range associated with proper operation; and
  - d. Recorded pressure drop data, and/or fan motor amperes and damper position.
19. Provide all documents related to the recordkeeping option selected by the facility to comply with Condition C.6.d.4 of the Title V Permit. Provide records required by the selected compliance option from April 2011 to the present.
20. For the natural gas fired steel billet reheat furnace, provide the following information in a Microsoft Excel Workbook or other compatible format, recorded and maintained pursuant to 40 C.F.R. § 64.9(b)(1), from April 2011 to the present:
- a. Recorded hours of operation;
  - b. Recorded hours of monitor downtime; and
  - c. Recorded hours of monitor downtime due to malfunctions.
21. For the rolling mill pond cooling tower and the contact cooling tower (meltshop spray), provide the following information, recorded and maintained pursuant to Section 4.d and Section 5.d of the Title V Permit, for the period from April 2011 to the present:
- a. Total dissolved solids (TDS) content (mg/L) of the circulating water;
  - b. Method used to determine the TDS; and

- c. Average TDS values.
- 22. Provide copies of all inspections performed on the control equipment, including, but not limited to monthly operational status inspections of the equipment required under 40 C.F.R. § 60.274a(d), for the period from April 2011 to the present.
  - 23. For the following emission units: EAF, stirring station, continuous casters, steel billet rehear furnace and their associated control devices, P005, P007, and P012 through P015, provide:
    - a. Copies of each current Preventive Maintenance Plan (PMP); and
    - b. Records of preventative maintenance performed on these units from April 2011 to the present.
  - 24. Provide copies of all scrap pollution prevention plans submitted to Ohio EPA or EPA from April 2006 to the present, pursuant to 40 C.F.R. Part 63, Subpart YYYYYY, National Emission Standard for Hazardous Air Pollutants for Area Sources: Electrical Arc Furnace Steelmaking Facilities (Subpart YYYYYY).
  - 25. Provide copies of all mercury switch plans submitted to Ohio EPA or EPA from April 2006 to the present, pursuant to Subpart YYYYYY.
  - 26. Provide all documents related to recordkeeping and reporting requirements pursuant to 40 C.F.R. § 63.10685(c), from April 2006 to the present.

## Appendix C

### Confidential Business and Personal Privacy Information

#### Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

## **Determining Whether the Information is Entitled to Confidential Treatment**

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph, and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

### **Personal Privacy Information**

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

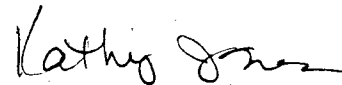
I, Kathy Jones, certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

Trevor Beers,  
Environmental Manager  
912 Cheney Ave.  
Marion, OH 43301-1801

I also certify that I sent a copy of the Request to Provide Information Pursuant to the Clean Air Act by E-Mail to:

Robert Hodanbosi, Chief  
Division of Air Pollution Control, Ohio EPA  
P.O. Box 1049  
Columbus, OH 43216-1049  
[bob.hodanbosi@epa.ohio.gov](mailto:bob.hodanbosi@epa.ohio.gov)

On the 22<sup>nd</sup> day of April 2016.



Kathy Jones, Program Technician  
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7011 1150 0000 2640 8572